

LATHAM & WATKINS LLP  
Steven M. Bauer (SBN 135067)  
*steven.bauer@lw.com*  
Dean G. Dunlavey (SBN 115530)  
*dean.dunlavey@lw.com*  
Daniel Scott Schecter (SBN 171472)  
*daniel.schecter@lw.com*  
Nima H. Mohebbi (SBN 275453)  
*nima.mohebbi@lw.com*  
355 South Grand Avenue  
Los Angeles, California 90071-1560  
Telephone: (213) 485-1234  
Facsimile: (213) 891-8763

Attorneys for Defendant  
Emirates NBD Bank PJSC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

INFOSPAN, INC.,  
  
Plaintiff,  
  
v.  
  
EMIRATES NBD BANK PJSC,  
  
Defendant.

Case No. 8:11-CV-01062 JVS (ANx)

**DECLARATION OF DANIEL  
SCOTT SCHECTER IN SUPPORT  
OF EMIRATES NBD BANK PJSC'S  
REPLIES IN SUPPORT OF  
MOTIONS *IN LIMINE* AND  
*DAUBERT* MOTIONS**

Action Filed: July 15, 2011  
Discovery Cutoff: December 15, 2014  
Pretrial Conference: TBD  
Trial Date: TBD

Pre-Trial Conference

Date: TBD  
Time: TBD  
Location: Ctrm. 10C

1 I, Daniel Scott Schechter, declare and state as follows:

2 1. I am an attorney with the law firm Latham & Watkins LLP, counsel of  
3 record for Defendant Emirates NBD Bank PJSC (“Emirates Bank”). I am a  
4 member in good standing of the State Bar of California. I have personal  
5 knowledge of the facts set forth in this Declaration and, if called as a witness,  
6 could and would testify competently thereto.

7 2. Attached hereto as **Exhibit ZZ** is a true and correct copy of a redline  
8 comparison between InfoSpan’s Complaint (Dkt. 1) and InfoSpan’s First Amended  
9 Complaint (Dkt. 232).

10 3. Attached hereto as **Exhibit AAA** is a true and correct copy of redline  
11 comparisons between InfoSpan’s Response to Emirates Bank’s First Set of  
12 Interrogatories, InfoSpan’s First Supplemental Response to Emirates Bank’s First  
13 Set of Interrogatories, InfoSpan’s Second Supplemental Response to Emirates  
14 Bank’s First Set of Interrogatories, and InfoSpan’s Third Supplemental Response  
15 to Emirates Bank’s Interrogatory No. 1.

16 4. Attached hereto as **Exhibit BBB** true and correct copy of highlighted  
17 excerpts from the deposition of Larry Scudder (Senior Vice President of  
18 Operations at InfoSpan during the relevant period), taken on January 22, 2014,  
19 during the course of this litigation.

20 5. Attached hereto as **Exhibit CCC** is a true and correct copy of an  
21 email from Larry Scudder to Pishu Ganglani dated July 27, 2007 and attaching  
22 correspondence, Bates-labeled LS0026243-47 and produced by Larry Scudder in  
23 this litigation. This document was marked as Exhibit 55 at the January 22, 2014  
24 deposition of Larry Scudder.

25 6. Attached hereto as **Exhibit DDD** is a is a true and correct copy of  
26 highlighted excerpts from the deposition of Ariel Pakes, PhD, taken on January 22,  
27 2015, during the course of this litigation.

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7. Attached hereto as **Exhibit EEE** is a true and correct copy of highlighted excerpts from the deposition of Benjamin Goldberg, PhD, taken on January 9, 2015, during the course of this litigation.

8. Attached hereto as **Exhibit FFF** is a true and correct copy of an October 6, 2015 email from Eileen Longo of Latham & Watkins LLP to Bill Isaacson of Boies, Schiller & Flexner LLP, attaching correspondence from Daniel Schechter of Latham & Watkins LLP.

9. Attached hereto as **Exhibit GGG** is a true and correct copy of an October 13, 2015 email chain between David Zifkin of Boies, Schiller & Flexner LLP and Daniel Schechter of Latham & Watkins LLP.

10. Attached hereto as **Exhibit HHH** is a true and correct copy of highlighted excerpts from the deposition of Manuel Orozco, PhD, taken on January 8, 2015, during the course of this litigation.

11. Attached as **Exhibit III** is a true and correct copy of highlighted excerpts from the deposition of Farooq Bajwa (Chairman and CEO of InfoSpan during the relevant period), taken on January 21, 2014, during the course of this litigation.

12. Attached hereto as **Exhibit JJJ** is a true and correct copy of the Rebuttal Expert Report of Jeffrey Kinrich, dated February 27, 2014.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed at Los Angeles, California on October 19, 2015.

/s/ Daniel Scott Schechter

Daniel Scott Schechter